

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE )  
CONFERENCE OF THE NAACP, )

and )

TAIWAN SCOTT, on behalf of )  
himself and all other similarly )  
situated persons, )

Plaintiffs, )

v. )

HENRY D. MCMASTER, in his )  
official capacity as Governor )  
of South Carolina; THOMAS C. )  
ALEXANDER, in his official )  
capacity as President of the )  
Senate; LUKE A. RANKIN, in his )  
official capacity as Chairman )  
of the Senate Judiciary )  
Committee; JAMES H. LUCAS, in )  
his official capacity as Speaker )  
of the House of Representatives; )  
CHRIS MURPHY, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Judiciary Committee; WALLACE )  
H. JORDAN, in his official )  
capacity as Chairman of the )  
House of Representatives )  
Elections Law Subcommittee; )  
HOWARD KNAPP, in his official )  
capacity as interim Executive )  
Director of the South Carolina )  
State Election Commission; JOHN )  
WELLS, Chair, JOANNE DAY, )  
CLIFFORD J. EDLER, LINDA MCCALL, )  
and SCOTT MOSELEY, in their )  
official capacities as members )  
of the South Carolina Election )  
Commission, )

Defendants. )

**DEPOSITION**

**OF**

**CHARLES J. BOYKIN, ESQ.**

1 A. Because we have several, I don't want to  
2 differentiate. I'll just have to leave it with that  
3 general, you know, metropolitan areas.

4 Q. Okay. All right. I'm going to scroll down to the  
5 next page on this document, and there's some  
6 discussion of the Congressional Districts here, and  
7 just so I'm clear, this deposition is taking part in  
8 reference to the State House districts that were  
9 recently enacted by the legislature. So I'm going  
10 to skip over the Congressional part, but I'm going  
11 to go back to what we were just talking about, where  
12 it says, John Ruoff stated there are four large  
13 areas of growth and he says they are all white  
14 areas. Along the coast, top and bottom, Rock Hill,  
15 Lancaster, and Greenville. Does that seem to be --  
16 well, does that -- let me rephrase that. Is that  
17 consistent with your understanding of growth in  
18 metropolitan areas?

19 A. Yeah, that's my recollection.

20 Q. Okay. And do you have any reason to doubt Dr.  
21 Ruoff's statement that the large growth in these  
22 areas is -- or that the large growth occurred in all  
23 white areas?

24 A. I would have no basis to doubt it. Correct.

25 Q. Okay. All right. I'm going to look towards the